

Attachment A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

NO: 1:16-CR-242

LAWRENCE G. NASSAR,
Defendant.

Hon. Janet T. Neff
United States District Judge

Response to Motion To Turn Over Funds in Inmate Trust Account
to Apply to Criminal Monetary Penalties.

Now here comes Lawrence G. Nassar, in a Pro-Se capacity and files this response to the Government's motion.

ARGUMENT

Mr. Nassar agrees with the Government's description of the sentence, special assessment, additional special assessment and restitution amounts. Mr. Nassar has been participating in the Inmate Financial Responsibility Program (IFRP) as per the contract signed with the United States Bureau of Prisons (BOP), paying quarterly payments of \$25.00. Mr. Nassar does not work for UNICOR nor any other BOP employment. All monies received by Mr. Nassar have been gifts from third parties, except for the \$600.00 EIP and the \$1,400.00 EIP. The receipt of these payments were consistent with established court rulings. More importantly, however is that despite these payments, gifts from third party sources have ceased since January 2021. Because of this, the EIP payments did NOT create a material change in Mr. Nassar's economic situation, and were by no means substantial. Although the Government would like this court to focus on the fact that Mr. Nassar has received

\$12,825.00. The language used by the government does not show that this was over a three and one half year period. This is approximately \$3,600.00 per year. For calendar year 2021 YTD, total receipts equal \$2,260.00, which is below or at the least consistant with previous years, and is in no way a substantial or material change. Additionally, the government wants to compare a monthly amount of \$8.33 per month, which is being paid per the contract signed with the BOP to an amount received over a 3.5 year period. A more apples to apples comparison would be to compare the \$8.33 to the monthly average amount of \$300.60 amount of the gifts received.

Penalizing Mr. Nassar for fully participating in the BOP run and managed IFRP program, and complying with all payments required by that contract is not the solution to the underlying problem. The solution would be to have the BOP prison industry system pay a living wage to inmates that would allow inmates to make reasonable payments towards restitution.

The real question here is " Is Mr. Nassar in compliance with this courts judgement that is being administered by the BOP through the IFRP?" The answer to that question based on objective reality and facts is "Yes". The fact is that Mr. Nassar is in full compliance with the IFRP, a program established and administered by the BOP. The government may not like the fact that Mr. Nassar is only paying the "minimum" amount required, the fact still remains that Mr. Nassar is in full compliance with the program.

In conclusion, Mr. Nassar humbly requests this court to deny the government's motion, due to the fact that Mr. Nassar is participating in the IFRP and has been since the beginning of his incarceration, is not delinquent on any payments, and is in full compliance with the IFRP contract signed with the BOP.

Submitted,


Lawrence G. Nassar

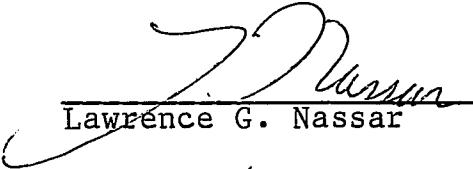
8/4/2021
Date

CERTIFICATE OF SERVICE

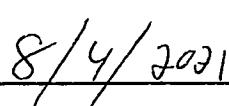
I, Lawrence G. Nassar, being duly sworn upon my oath, do hereby certify that a response to the government's motion was served on the parties below, by depositing same into the United States Mail at the United States Penitentiary #2 in Coleman, Florida on 8/4/2021.

United States District Court
Western Distrct of Michigan
399 Federal Building
110 Michigan N.W.
Grand Rapids, Michigan 49503-2363

Assistant United States Attorney
United States Attorney's Office
330 Ionia Avenue NW
Grand Rapids, Michigan 49503



Lawrence G. Nassar



Date

LAWRENCE NIKSEN 21504040
UNITED STATES PENITENTIARY, COLUMBIA,
FL 30X 1034
COLUMBIA, FL 33531

TAMPA, FL 335
SAINT PETERSBURG FL
5 AUG 2021 PM 4 L



ASSISTANT UNITED STATES ATTORNEY
UNITED STATES ATTORNEY'S OFFICE
330 TOWER AVENUE NW
GRAND RAPIDS, MI 49503
49503-254999

